

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:23-cv-00775-P
	§	
KIWI.COM, INC. and KIWI.COM, S.R.O.,	§	
	§	
Defendants.	§	

**MOTION FOR LEAVE TO SUBMIT APPLICATION FOR ADMISSION TO THE BAR
OF THE UNITED STATES COURT FOR THE NORTHERN DISTRICT OF TEXAS IN
LIEU OF APPLICATION FOR ADMISSION *PRO HAC VICE***

On August 24, 2023, the Court entered an Order requiring Cameron Nelson and Nathan James Muyskens, both of Greenburg Traurig, LLP and counsel for Plaintiff American Airlines, Inc., to apply for admission *pro hac vice* by August 31, 2023. [Dkt. No. 12 at 1]. Mr. Muyskens filed an Application for Admission *Pro Hac Vice* on August 25, 2023. [See Dkt. No. 13]. The Court denied Mr. Muyskens's application and ordered him to instead be admitted to the bar of the Northern District of Texas. [Dkt. No. 14 at 1].

Based on the Court's Orders,¹ Mr. Muyskens and Mr. Nelson have prepared Applications for Admission to the Bar of the United States Court for the Northern District of Texas. While Mr. Muyskens has already submitted his application to this Court, Mr. Nelson has not yet been able to submit an application as he has not yet received a Certificate of Good Standing from the State Bar of Illinois. Mr. Nelson therefore respectfully requests that he be

¹ Mr. Nelson prior *pro hac vice* admissions in the Northern District of Texas in recent years are nearly identical to those of Mr. Muyskens. Based on that fact and the Court's Order denying Mr. Muyskens's *pro hac vice* application [Dkt. No. 14], Mr. Nelson requests admission to the Northern District of Texas rather than for admission *pro hac vice* for this case only.

permitted to submit an Application for Admission to the Bar on or before September 7, 2023,² rather than file an application for admission *pro hac vice* on or before August 31, 2023.

Dated: August 31, 2023

Respectfully submitted,

/s/ Julia G. Wisenberg

Dee J. Kelly, Jr.

State Bar No. 11217250

dee.kelly@kellyhart.com

Lars L. Berg

State Bar No. 00787072

lars.berg@kellyhart.com

Tyson Lies

State Bar No. 24087927

Tyson.lies@kellyhart.com

Julia G. Wisenberg

State Bar No. 24099146

Julia.wisenberg@kellyhart.com

KELLY HART & HALLMAN LLP

201 Main Street, Suite 2500

Fort Worth, Texas 76102

(817) 332-2500

Nathan J. Muyskens

nathan.muyskens@gtlaw.com

GREENBERG TRAURIG, LLP

2101 L Street, N.W., Suite 1000

Washington, DC 20037

Telephone: 202-331-3100

Facsimile: 202-331-3101

Cameron M. Nelson

nelsonc@gtlaw.com

GREENBERG TRAURIG LLP

77 West Wacker Drive, Suite 3100

Chicago, IL 60601

Telephone: (312) 456.6590

Facsimile: (312) 456-8435

**ATTORNEYS FOR PLAINTIFF
AMERICAN AIRLINES, INC.**

² Mr. Nelson expects to receive a Certificate of Good Standing tomorrow, September 1, 2023, absent any unforeseeable delay, and will promptly submit his Application for Admission to the Bar upon receipt of the Certificate.